

### **REMARKS**

Claims 1-20 are pending in this application. Claims 6-8, 10 and 12-20 are withdrawn from consideration. Claims 1, 9 and 11 are independent. Based on the amendments and remarks made herein, Applicant respectfully requests reconsideration and withdrawal of the outstanding rejections.

By this amendment, Applicant has amended the claims to more appropriately recite the present invention. It is respectfully submitted that these amendments are being made without conceding the propriety of the Examiner's rejections, but merely to timely advance prosecution of the present application.

In the outstanding Official Action, the Examiner rejected claim 11 under 35 U.S.C. §101; and rejected claims 1-5, 9 and 11 under 35 U.S.C. §102(e) as being anticipated by Brooks (USP 7,143,432). Applicant respectfully traverses this rejection.

#### **Claim Rejection – 35 U.S.C. §101**

The Examiner rejected claim 11 asserting it is not directed to statutory subject matter. By this amendment, Applicant has amended claim 11 to recite, *inter alia*, a computer-readable medium storing instructions, executed by a computer, to execute a moving image conversion method. Applicant respectfully submits that amended claim 11 is directed to statutory subject matter. As such, it is respectfully requested that the outstanding rejection be withdrawn.

#### **Claim Rejection – 35 U.S.C. §102**

The Examiner rejected claim 1 asserting Brooks teaches all of the claim elements. Specifically, the Examiner asserts that Brooks discloses an encoder that encodes a plurality of video frames to a desired output video stream format (col. 3, lines 36-39). The Examiner asserts that this teaching is sufficient to teach the multimedia image generation means as claimed.

The disclosure of Brooks is directed to a system for transforming streaming video data. Brooks provides a system wherein "on the fly adaptation to desired output parameters may be made with respect to display size, frame rate, bit-depth, bit rate, encoding format, and the like." (col. 3, lines 7-14). As discussed in detail in Figs. 5A and 5B, a request is received from a mobile device for a stream of video data. The bandwidth and format requirements of the requesting device are determined (col. 15, lines 16-30). The data is formatted according to the bandwidth and format requirements of the requesting device. The data is encoded and transmitted to the requesting device (col. 16, lines 57-67). Other types of formats may be used, for example, AVI, MPG, MOV, XING and the like.

In contrast, the invention of claim 1, as amended, recites, *inter alia*, a moving image conversion apparatus comprising sampling means for sampling frames from a moving image; and multimedia image generation means for generating a multimedia image in a multimedia format by compressing the frames according to a compression method considering two-dimensional redundancy, **wherein the multimedia image in the multimedia format is an image in a format that enables interactive serial display of every frame.**

Applicant respectfully submits that the formats disclosed by Brooks are wholly insufficient to teach or suggest the multimedia image in the multimedia format is an image in a format that enables interactive serial display of every frame. As such, claim 1, as amended, it not anticipated by Brooks. It is respectfully requested that the outstanding rejection be withdrawn.

It is respectfully submitted that claims 2-5 are allowable for the reasons set forth above with regard to claim 1 at least based on their dependency on claim 1. It is further respectfully submitted that claims 9 and 11 include elements similar to those discussed above with regard to claim 1 and thus these claims are allowable for the reasons set forth above with regard to claim 1.

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Catherine M. Voisin Reg. No. 52,327 at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.147; particularly, extension of time fees.

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Respectfully submitted,

By 

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